

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

In re:

DOW CORNING CORPORATION,

Reorganized Debtor.

Case No. 95-20512

(Chapter 11)

Judge Denise Page Hood

JOINT REPORT FOR NOVEMBER 16, 2010 STATUS CONFERENCE

The London Market Insurers (“LMI”) and Dow Corning Corporation (“Dow Corning”) hereby submit this joint report in advance of the telephonic status conference set for 2:30 p.m. on November 16, 2010.

1. **Fact Discovery:** Fact discovery closed under the Court's Amended Scheduling Order on October 15, 2010. The parties have taken depositions of fact (non-expert) witnesses, nine by Dow Corning and six by the LMI. The parties each served additional written discovery requests in September 2010. The parties have a few outstanding issues concerning these written discovery requests that they are attempting to resolve. Dow Corning notes that it has reserved its rights with regard to further fact discovery in light of its pending Motion for Rehearing or Reconsideration of Section II.I of the Court’s June 15, 2010 Discovery Order and certain aspects of reinsurance-related discovery; the LMI reserve their rights to oppose further fact discovery in these regards.

2. **Expert Discovery:** The LMI served their three expert reports on November 5, 2010, pursuant to Dow Corning’s agreement to a one-week extension. The deadline under the Amended Scheduling Order for Dow Corning's expert reports is December 17, 2010. but Dow Corning also plans to seek a reasonable extension. The parties entered into a stipulation concerning the scope of expert discovery under which they will abide by the amendment to Fed. R. Civ. P. 26 effective December 1, 2010.

3. **Mediation.** The parties were required to participate in a second day of mediation by November 5, 2010, under the Amended Scheduling Order. They mediated for a full day on October 22, 2010, with David Geronemus in New York. The process is continuing.

4. Subject to the above, the case is proceeding on the schedule set forth in the Amended Scheduling Order.

Respectfully submitted,

/s/ David Eisenberg

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Dated: November 15, 2010

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